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# Exhibit A

**AFFIDAVIT OF CHARLES RODRICK**

I, Charles Rodrick, declare as follows:

1. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court I could and would truthfully testify to the following information based upon my own personal knowledge.
2. I am also the sole member of Web Express, LLC, an Arizona L.L.C. and have authority to speak on its behalf.
3. I make this affidavit in support of the Motion to Dismiss (the "Motion") filed in Case Number 1:15-cv-00177, United States District Court for the Western District of Michigan (the "Lawsuit").
4. I make this affidavit and the statements therein both in my personal capacity as well as on behalf of Web Express, LLC.
5. All factual allegations set forth in the Motion are hereby incorporated by reference as if fully set out herein.
6. The Website(s) (as referenced in the Motion and/or Plaintiff's Complaint) simply archive public records of convictions, particularly those convictions of sex-related offenses, in all 50 states.
7. Web Express, LLC has no connection to, or control over, any Website(s) referenced in the Complaint.

- 1 8. As a private database, the Website(s) archive information released by a  
2 wide range of government agencies, all of which is a matter of public  
3 record.  
4
- 5 9. The information on the Website(s) is provided to the public, nationwide, free  
6 of charge.  
7
- 8 10. No goods or services are actually sold on any of the Website(s).
- 9 11. No specific city, state, or any other geographical location is specifically  
10 targeted by any statement, offering, or other aspect of any Website over  
11 which I am (or Web Express LLC is) responsible for or have control over.  
12
- 13 12. The servers hosting any Website(s) referenced in the Complaint are  
14 maintained by an Arizona-based company.  
15
- 16 13. The developers of any Website(s) referenced in the Complaint are based  
17 in Arizona.
- 18 14. While the Website(s) referenced in the Complaint does/do contain some  
19 advertising, neither I nor Web Express LLC had and have no control over  
20 the content of that advertising and did not advertise or promote any service  
21 or offer directed at Michigan.  
22
- 23 15. The hosting & Internet services for any Website(s) referenced in the  
24 Complaint are provided by an Arizona company.  
25
- 26 16. Neither I nor Web Express LLC own, rent, or lease any property in  
27 Michigan, nor do I or Web Express LLC have any assets or any claim to  
28 any property in that state.

1 17. Neither I nor Web Express LLC are employed by, or are any way formally  
2 affiliated with, any governmental agency.  
3

4 18. I do not reside in Michigan and Web Express LLC is not incorporated in  
5 that state nor under its laws.  
6

7 19. Neither I nor Web Express LLC regularly conduct business in Michigan or  
8 own or have any interest in any companies that regularly do business in  
9 Michigan.  
10

11 20. To my knowledge all trade names mentioned in the lawsuit are registered  
12 in Arizona.  
13

14 21. To the best of my knowledge and belief, all of the computers, documents,  
15 and files related to the functionality of any Website(s) referenced in the  
16 Complaint are located in Arizona.  
17

18 22. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under  
19 the laws of the United States of America that the foregoing is true and  
20 correct.  
21

22 23. I declare under penalty of perjury under the laws of the State of Michigan  
23 that the foregoing is true and correct.  
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1 Under penalty of perjury, I Charles Rodrick execute the forgoing document.  
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3 EXECUTED: June 22, 2015  
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7 Charles Rodrick  
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